

90067309

RCRA FACILITY ASSESSMENT EVALUATIONPRELIMINARY REVIEW, VISUAL SITE INSPECTION AND SAMPLING VISIT

Region VI, Technical Compliance Section

FACILITY'S NAME(S): Texas Electric Coop, Cedar BayouEPA ID NUMBER: TXD041468836ADDRESS: Bevil Loop Rd. - SE of Jasper, TexasLOCATION: 0.4 mi. East on U.S. Route 190 from inter. of Rt. 63, then
0.6 mi. South on Bevil Rd.SITE DESCRIPTION: Treats Utility Poles with CreosoteDATE OF INSPECTION: 8/27/87 VSI CONDUCTED BY: A.T. Kearney/CentaurDATE OF SAMPLING VISIT: 8/29/87 SV CONDUCTED BY: A.T. Kearney/CentaurPREPARED BY: A.T. Kearney/Centaur DATE PREPARED: 9/10/87REVIEWED BY: Keith N. Phillips - EPA DATE REVIEWED: 8/16/88 - 9/1/88FACILITY STATUS: Closure-LD CLOSURE PLAN APPROVED DATE: 10/7/86

ANY ON-GOING STATE/FED 264, 265, or 270 CORRECTIVE ACTION OR CERCLA ACTION:
Yes - 265. Managed industrial wastes in such a manner as to cause a discharge or threat of discharge into or adjacent to the waters in the state without authorization.

DOES FACILITY HAVE A CERCLA FILE? YES ☒ NO ☐When was the CERCLA PA/SI performed at this facility: 10/22/86DOES FACILITY HAVE UIC WELL? YES ☐ NO ☒ TYPE: N/ATYPE OF DRINKING WATER SUPPLY WITHIN A 3-MILE RADIUS: Groundwater -Jasper AquiferTARGET POPULATION WITHIN A 3-MILE RADIUS: 7,000 - Jasper CityRECOMMENDATIONS: ☒ R.F.I. ☐ I.M. ☐ No Further Action under RFA

(Indicate only one unless I.M. is marked)

SUPERFUND
FILE☒ 3004(u) ☐ 3008

JAN 12 1993

Possible Enforcement Action: ☐ 3008(a) ☒ 3008(h)

REORGANIZED

I. EVALUATIONA. NUMBER OF SWMU(s)/AOC(s) INVESTIGATED DURING THE PR/VSI: 271. NUMBER OF SWMU(s) INVESTIGATED DURING THE PR/VSI: 21

<u>LIST OF SWMU(s)</u>	<u>REGULATED BY RCRA*</u> (SUBTITLE C)	<u>STATUS**</u>
1. (SWMU #1) Bulk Storage (Bark)	N	A
2. (SWMU #2) Pond 1 (F-2)	Y	I
3. (SWMU #3) Pond 2 (F-3)	Y	I
4. (SWMU #4) Former Pond A	N	C
5. (SWMU #5) Pond B (F-12)	N	A
6. (SWMU #6) Pond C (F-7)	Y	C
7. (SWMU #7) Pond D (F-8)	Y	C
8. (SWMU #8) Pond E (F-9)	Y	A
9. (SWMU #9) Pond F (F-10)	Y	I
10. (SWMU #10) Vacuum Cooling Pond (F-4)	Y	I
11. (SWMU #11) Waste Oil Pit (F-5)	Y	I
12. (SWMU #12) Sump (F-6)	Y	I
13. (SWMU #13) Boiler/Industrial Furnace (B-8)	N	A
14. (SWMU #14) Wastewater Treatment Tank (Tank D)	N	A
15. (SWMU #15) API Separator (Tank V)	N	I
16. (SWMU #16) Water Storage Tank (Tank E)	N	A
17. (SWMU #17) Containment Below Retorts (Basement/Oil) Sump of B-10	N	A
18. (SWMU #18) Creosote Dewatering Tank (Tank K)	N	I
19. (SWMU #19) Wastewater Tanks (Tank G & H)	N	I
20. (SWMU #20) Containment Area Around Tank Farm	N	A
21. (SWMU #21) Blowdown Tank (Tank H)	N	I

* Y-Yes, N-No

** Active, Inactive, Closed (A, I, & C)

2. AREA(s) OF CONCERN: 6

1. (AOC #1) Loading Truck Area
2. (AOC #2) Truck Unloading Area
3. (AOC #3) NPDES Outfall 001
4. (AOC #4) Former Lime Pits
5. (AOC #5) Run-off Ditch South of Retorts
6. (AOC #6) Run-off Ditch South of Pond 1

SWIU or AOC SAMPLING LOCATION	SAMPLE/MEDIA SAMPLE TYPE (GRAB, COMPOSITE)	PARAMETERS	RESULTS
<p>Sample 3159F-1 & 3159F-11</p> <p><u>SWIU #2 - Pond 1</u></p> <p>South (down-gradient) site of pond, at base of berm.</p>	Soil-Grab	<p>Inorganics</p> <p>Organics</p>	<p>Sample #3159F-1 Duplicate Sample 3159F-11</p> <p>Barium 27 mg/Kg 34 mg/Kg</p> <p>Chromium 5.9 mg/Kg 9.3 mg/Kg</p> <p>Lead 7.6 mg/Kg 10 mg/Kg</p> <p>Napthalene 450,000 ug/Kg 1,200,000 ug/Kg</p> <p>2-Methyl Napthalene 250,000 ug/Kg 540,000 ug/Kg</p> <p>Acenaphthylene 14,000 ug/Kg 28,000 ug/Kg</p> <p>Acenaphthene 560,000 ug/Kg 1,200,000 ug/Kg</p> <p>Dibenzofuran 330,000 ug/Kg 650,000 ug/Kg</p> <p>Fluorene 520,000 ug/Kg 980,000 ug/Kg</p> <p>Phenanthrene 1,600,000 ug/Kg 3,000,000 ug/Kg</p> <p>Anthracene 140,000 ug/Kg 270,000 ug/Kg</p> <p>Fluoranthene 1,200,000 ug/Kg 2,000,000 ug/Kg</p> <p>Pyrene 640,000 ug/Kg 960,000 ug/Kg</p> <p>Benzo (a) Anthracene 140,000 ug/Kg 220,000 ug/Kg</p> <p>Chrysene 150,000 ug/Kg 210,000 ug/Kg</p> <p>Benzo (b) Fluoranthene 78,000 ug/Kg 130,000 ug/Kg</p> <p>Benzo (a) Pyrene 37,000 ug/Kg 59,000 ug/Kg</p>
<p>Sample 3159F-2</p> <p><u>SWIU #3 - Pond 2</u></p> <p>The toe of the berm on SW corner of Pond 2.</p>	Soil-Grab	<p>Inorganics</p> <p>Organics</p>	<p>Sample #3159F-2</p> <p>Barium 20 mg/Kg</p> <p>Chromium 3 mg/Kg</p> <p>Lead 19 mg/Kg</p> <p>Phenanthrene 55 mg/Kg</p> <p>Fluoranthene 140 mg/Kg</p> <p>Pyrene 130 mg/Kg</p> <p>Chrysene 160 mg/Kg</p> <p>Benzo (b) Fluoranthene 190 mg/Kg</p>

B. SAMPLING VISIT

SMMU or AOC SAMPLING LOCATION	SAMPLE/MEDIA SAMPLE TYPE (GRAB/COMPOSITE)	PARAMETERS	RESULTS	
Sample 3159F-3 & 3159F-12 SMMU #5 - Pond B In drainage area 15' below outfall of Pond B.	Soil-Grab	Inorganics	Sample #3159F-3	Duplicate Sample 3159F-12
			Arsenic 6.6	N.D.
			Barium 46 mg/Kg	30 mg/Kg
			Cadmium N.D.	2.8 mg/Kg
			Chromium 21 mg/Kg	9.5 mg/Kg
			Lead 11 mg/Kg	7.2 mg/Kg
		Organics	Phenanthrene	71 ug/Kg 53 ug/Kg
			Fluoranthrene	210 ug/Kg 1,800 ug/Kg
			Pyrene	210 ug/Kg 1,000 ug/Kg
			Butylbenzyl-phthalate	260 ug/Kg 210 ug/Kg
			Benzo (a) Anthracene	160 ug/Kg 380 ug/Kg
			Chrysene	310 ug/Kg 550 ug/Kg
			Benzo (b) Fluoranthene	350 ug/Kg 480 ug/Kg
			Benzo (a) Pyrene	140 ug/Kg 180 ug/Kg
			Indeno (1,2,3-cd)	
			Pyrene	N.D. 84 ug/Kg
			Benzo (g,h,i) Perylene	N.D. 87 ug/Kg
Sample 3159F-4 SMMU #6 - Pond C	Soil-Grab	Inorganics	Sample #3159F-4	
			Barium 60 mg/Kg	
			Chromium 8.7 mg/Kg	
			Lead 9.5 mg/Kg	
		Organics	Naphthalene	63 ug/Kg
			Dibenzofuran	33 ug/Kg
			Pentachlorophenol	120 ug/Kg
			Phenanthrene	140 ug/Kg
			Anthracene	88 ug/Kg
			Fluoranthene	340 ug/Kg
			Pyrene	310 ug/Kg
			Benzo (a) Pyrene	220 ug/Kg

B. SAMPLING VISIT

SWMU or AOC SAMPLING LOCATION	SAMPLE/MEDIA SAMPLE TYPE (GRAB/COMPOSITE)	PARAMETERS	RESULTS
Sample 3159F-4 <u>SWMU #6 - Pond C</u> (Cont'd.)	Soil/Grab	Inorganics	Sample #3159F-4 bis(z-ethylhexyl)phthalate 110 ug/Kg Chrysene 610 ug/Kg Benzo (b) Fluorathene 960 ug/Kg Benzo (a) Pyrene 360 ug/Kg Indeno (1,2,3-cd) Pyrene 350 ug/Kg Benzo (g,h,i) Perylene 340 ug/Kg
Sample 3159F-5 <u>SWMU #7 - Pond D</u> Base of an embark- ment on the east (downgradient) side of Pond D	Soil-Grab	Inorganics Organics	Sample #3159F-5 Arsenic 6.8 mg/Kg Barium 87 mg/Kg Chromium 11 mg/Kg Lead 8.0 mg/Kg None Detected
Sample 3159F-6 <u>SWMU #8 - Pond E</u> 160' northeast (downgradient) from Pond E, near monitoring well #1	Soil-Grab	Inorganics	Sample #3159F-6 Barium 53 mg/Kg Chromium 11 mg/Kg Lead 7.4 mg/Kg
Sample 3159F-7 <u>SWMU #9 - Pond F</u> 15' from the NE corner of the facility	Soil-Grab	Inorganics Organics	Sample #3159F-7 Arsenic 7.2 mg/Kg Barium 103 mg/Kg Chromium 12 mg/Kg Lead 9.2 mg/Kg Fluoranthene 46 ug/Kg bis (z-ethyl-hexyl) phthalate 2,600 ug/Kg

B. SAMPLING VISIT

SMMU or AOC SAMPLING LOCATION	SAMPLE/MEDIA SAMPLE TYPE (GRAB/COMPOSITE)	PARAMETERS	RESULTS	
Sample 3159F-9 <u>SMMU #11</u> Former Waste Oil Pit and SMMU #12- Former Sump down- gradient from sump at the SE corner of the unit.	Soil-Grab	Inorganics Organics	Sample #3159F-9 Arsenic 7.6 mg/Kg Barium 49 mg/Kg Chromium 9.5 mg/Kg Lead 10 mg/Kg Nickel 5.8 mg/Kg Naphthalene 230 ug/Kg 2-Methyl/naphthalen 100 ug/Kg Acenaphthene 220 ug/Kg Fluorene 270 ug/Kg Phenanthrene 1,700 ug/Kg Anthracene 2,000 ug/Kg Fluoranthene 3,300 ug/Kg Pyrene 9,300 ug/Kg Benzo(a)Anthracene 3,300 ug/Kg Chrysene 7,300 ug/Kg Benzo(b)Fluoranthene 9,500 ug/Kg Benzo(a)Pyrene 2,800 ug/Kg Indeno (1,2,3-ed) Pyrene 1,700 ug/Kg Benzo (g,h,i) Perylene 1,600 ug/Kg	
Samples #3159F-10 & 3159F-13 <u>SMMU #16 - Tank E</u> Sampling point was outside the concrete contain- ment dike which surrounds Tank E.	Soil-Grab	Organics Inorganics	Sample #3159F-10 Duplicate Sample #3159F-11 Barium 18 mg/Kg 22 mg/Kg Baryllium 0.87 mg/Kg N.D. Chromium 6.1 mg/Kg 8.3 mg/Kg Lead 12 mg/Kg 12 mg/Kg Mercury 0.2 mg/Kg 0.4 mg/Kg Naphthalene 170,000 ug/Kg 240,000 ug/Kg 2-Methyl-naphthalene 77,000 ug/Kg 110,000 ug/Kg Acenaphthylene 7,400 ug/Kg 9,100 ug/Kg Acenaphthene 260,000 ug/Kg 330,000 ug/Kg Dibenzofuran 120,000 ug/Kg 140,000 ug/Kg	

B. SAMPLING VISIT

SHMU or AOC SAMPLING LOCATION	SAMPLE/MEDIA SAMPLE TYPE (GRAB/COMPOSITE)	PARAMETERS	RESULTS	
Samples #3159F-10 & 3159F-13 SHMU #16 - Tank E (Cont'd.)			Fluorene	180,000 ug/Kg 230,000 ug/Kg
			Phenanthrene	410,000 ug/Kg 530,000 ug/Kg
			Anthracene	170,000 ug/Kg 180,000 ug/Kg
			Fluoranthene	760,000 ug/Kg 1,200,000 ug/Kg
			Pyrene	380,000 ug/Kg 480,000 ug/Kg
			Benzo(a)Anthracene	100,000 ug/Kg 120,000 ug/Kg
			Chrysene	90,000 ug/Kg 160,000 ug/Kg
			Benzo(a) Pyrene	34,000 ug/Kg 60,000 ug/Kg
			Indeno (1,2,3-cd)	10,000 ug/Kg N.D.
Sample #FF-206 Background Soil Sample was collec- ted from an undis- turbed area in a clearing on the west side of the facility.	Grab-Soil	Inorganics	Sample #FF 206	
			Aluminum	15,700 mg/Kg
			Arsenic	9.19 mg/Kg
			Barium	53.4 mg/Kg
			Calcium	857 mg/Kg
			Chromium	13.7 mg/Kg
			Iron	13,700 mg/Kg
			Lead	13.7 mg/Kg
			Magnesium	1,010 mg/Kg
			Potassium	534 mg/Kg
			Vanadium	30.4 mg/Kg
			Zinc	7.4 mg/Kg
		Organics	Sample #FF 349	
			None Detected	

C. NUMBER SWMU/AOC TO BE INCLUDED IN THE RFI: 5 SWMU 4 AOC
 (Except RCRA units subject to Subpart F refer to Section E)

1. NUMBER OF SWMU/AOC AT WHICH RELEASES HAVE BEEN IDENTIFIED: 5 SWMU 4 AOC

<u>LIST OF SWMU</u>	<u>RELEASE TO</u>	<u>NOTED DOCUMENTATION OF RELEASE</u>
1. Former Pond A (SWMU #4)	Soil/GW	Unit is an unlined surface impoundment which was closed in 1981 under guidance of the TWC. Waste was solidified in place. Leachate was observed leaking from the closed pond during the VSI. The immediate downgradient monitoring well for the area shows elevated levels of TOC, phenols, and Arsenic.
2. Pond B (SWMU #5)	Soil/GW	Unit is an unlined surface impoundment. Soil sampling 29 July 87 exhibits elevated levels of organic constituents (PNA) associated with creosote. Downgradient monitoring well for the area exhibits elevated levels of TOC, phenols, and Arsenic. (Sample #3159F-3)
3. Former Sump (SWMU #12)		Sampling conducted in 1983 indicated PNA-contaminated soil at minimum depth of 11.5" below the unit.
4. Oil/Water Separator (SWMU #15)	Soil/GW	Dark stained soil was noted surrounding the unit during the VSI. No apparent action was being taken to clean up the contaminated soil. Unit is known to contain hazardous constituents.
5. Tank E (SWMU #16)		Unit is a steel tank with a diked unlined containment area. Sample taken outside of containment wall shows elevated levels of PNA in the soil.

<u>LIST OF AOC</u>	<u>RELEASE TO</u>	<u>NOTED DOCUMENTATION OF RELEASE</u>
1. Loading Track Area (AOC #1)	Soil/GW	Soil was reported to be visually contaminated during the VSI. Downgradient monitoring well for the area has the highest levels of contamination at the facility.

<u>LIST OF AOC</u>	<u>RELEASE TO</u>	<u>NOTED DOCUMENTATION OF RELEASE</u>
2. HPDES Outfall 001 (AOC #3)	Soil/GW	Samples taken near Outfall point exhibit elevated levels of PNAs. (Sample #3159F-3)
3. Run-off Ditch South of Retorts (AOC #5)		Sampling 29 July 87 indicates soil contamination. (PNA)
4. Run-off Ditch South of Pond 1 (AOC #6)		Visual evidence of contamination was noted during VSI and verified from sampling visit. (Sample #3159F-1)

GW - Groundwater
PNA - Polynuclear Aromatics

2. NUMBER OF SWMU AT WHICH RELEASE IS HIGHLY POSSIBLE: 0
3. NUMBER OF SWMU WHERE A DETERMINATION OF RELEASE CAN NOT BE MADE DUE TO LACK OF INFORMATION: 1

<u>LIST OF SWMU</u>	<u>RATIONALE</u>
1. (SWMU #6) Pond E	Unlined surface impoundment which received hazardous constituents from 1977 to 1985. Unit has been converted to a lined Biological Treatment unit. Efforts were made to dispose of existings hazardous constituents and contaminated soils, however no data supporting clean closure prior to conversion is available.

- D. NUMBER OF SWMU/AOC FOR WHICH AN RFI IS NOT RECOMMENDED: 9 SWMU, 2 AOC

<u>LIST OF SWMU</u>	<u>RATIONALE</u>
1. Bulk Storage (Bark Piles) (SWMU #1)	No hazardous constituents are managed at this unit. No evidence of release was noted during the VSI.
2. Boiler/Industrial Furnace (SWMU #13)	No hazardous constituents are handled at this unit. No evidence of release was noted during the VSI. Emissions are regulated by TACB.
3. Wastewater Treatment Tank (SWMU #14)	Unit is above ground steel tank. No evidence of release was noted during the VSI.

LIST OF SWMURATIONALE

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| 4. Contaminants Below Retorts
(SWMU #17) | Unit is a 40'x 65' concrete slab. No evidence of release was noted during the VSI. |
| 5. Creosote Dewatering Tank
(SWMU #18) | Unit is above ground steel tank, which is no longer in use. No evidence of release was noted during the VSI. |
| 6. Wastewater Tanks
(SWMU #19) | Units are above ground cylindrical steel tanks. No evidence of release was noted during the VSI. |
| 7. Containment Area Around Tank Farm (SWMU #20) | Unit is a diked concrete pad for containment of 3 steel tanks. No evidence of release was noted during the VSI. |
| 8. Blowdown Tank (Tank H)
(SWMU #21) | Unit is above ground steel tank. No evidence of release was noted during the VSI. |
| 9. Pond E (SWMU #8) | Unit is presently undergoing RCRA closure. No evidence of release was observed during the VSI. |

LIST OF AOCRATIONALE

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| 1. Truck Unloading Area
(AOC #2) | No evidence of release observed during the VSI and sampling visit. |
| 2. Former Lime Pits
(AOC #4) | No evidence of release observed during the VSI and sampling visit. |

- E. SUPPLEMENTAL INFORMATION ON RCRA REGULATED UNITS: 6
(Describe any problems identified or suspected from regulated units including identified releases to groundwater)

LIST OF SWMUCONCERNS

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| 1. (SWMU #2) Pond 1 | Unit is an unlined surface impoundment, known to receive wastewater containing hazardous constituents. A berm was breached in 1984. During the VSI discolored soil was noted 12" to 24" below ground level on |
|---------------------|---|

LIST OF SWMUCONCERNS

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| 1. (SWMU #2) Pond 1
(Cont'd.) | the south end of the pond in a drainage ditch. Soil sample collected 29 July 87 from outside the south downgradient end of the pond exhibits elevated levels of organic constituents in the soil. (PNA) Unit is targeted for closure. |
| 2. (SWMU #6) Pond C | Sampling conducted in 1983 indicated 10-40ppb PNA at depths of 2.5" and 11.5", below the sludge. Berm vegetation within 2' of the water level appears dead. Downgradient monitoring well MW #5 indicates elevated levels of TOC, & phenols. Unit is unlined, and targeted for closure. |
| 3. (SWMU #10) Vacuum Cooling Pond | Sampling conducted in 1983 indicated contaminated soil at a depth of 11.5" below the sludge. Unit is unlined, and targeted for closure. |
| 4. (SWMU #11) Former Waste Oil Pit | Samples collected in 1983 indicated PNA contaminated soil at a minimum depth of 11.5". Unit is unlined, and targeted for closure. |
| 5-6. (SWMU #3) Pond #2 and
(SWMU #9) Pond F | Units are unlined surface impoundments scheduled for closure. Downgradient wells for the facility indicate GW contamination. Soil borings near Pond #2 indicate product at a depth of 30' below ground level. (See II.B) |

II. FINDINGSA. RECOMMENDATIONS: (EPA, STATE and/or CONTRACTOR)

The Contractor recommends an RFI for SWMUs 2,4,5,10-11,15 and AOC #1,3,5,6. EPA concurs with the exception of SWMUs 2,10,11. These units are RCRA-regulated.

B. ADDITIONAL COMMENTS:

Groundwater contamination was first reported in Dec. '81 and continues to exist today. Hydrogeology of the area indicates three directions of GW flow; to the Southwest in the western portion of the facility, to the south along the southern edge of the facility, and to the Northeast in the Northern portion of the facility.

The GW monitoring program is such, that areas are monitored, and not individual units. This type of program may not identify all source areas, and extent of GW contamination. Three separate areas of unlined surface impoundments are found at the facility; the Northeast area, Northwest area, and the Southwest area. Soil borings drilled in 1983 in the Northeast area found product and product order at depths of 30'. The depth of the groundwater is believed to be 23'-49' below the top of monitoring well casings.

Currently the facility is under enforcement action from the Texas Water Commission for GW contamination. Interim Corrective Measures are to begin after July '88. An area wide RI/FS has been conducted and submitted to TWC which is reviewing the study prior to Interim Corrective Measures are to begin. The facility also is under LOIS for lack of financial assurance by EPA. In 1986 Texas Electric Coop, Jasper, TX, was listed as a significant Non-Complier by TWC.

CONCUR: Lydia M. Boada Clista

DATE: 9/1/88